

**REPLY DECLARATION  
OF  
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ATTACHMENT 12**

# FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO OBSERVATION 68



Florida OSS Test  
Observation 68

July 26, 2001

## OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5).

### Observation:

**KPMG Consulting cannot replicate the values for the "Ordering: Percent Flow Through Service Requests (Detail)" Service Quality Measurement (SQM) report for the CLEC Aggregate (November 2000). (PMR5)**

### Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data<sup>1</sup> (PMAP raw data<sup>2</sup>) used to create these reports.<sup>3</sup>

### Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Ordering: Percent Flow-through Service Requests (Detail)" SQM. The discrepancy is listed in the following table.

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<sup>1</sup> The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

<sup>2</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

<sup>3</sup> These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

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	Measurement	Category	KPMG Consulting- Calculated Value	BellSouth Reported Value
1	Auto Clarification	CLEC aggregate	40824	41568

### Question:

KPMG Consulting requires clarification of the calculation of "Auto Clarification" since other report values for this SQM are derived from the "Auto Clarification" value.

### BellSouth Response:

In this Observation, KPMG has found that the number of auto clarifications calculated in their test of the October 2000 Percent Flow Through Service Requests Report is not the same number of auto clarifications reported by BellSouth.

KPMG previously tested the October 2000 flow through report in Georgia. In their Georgia test, KPMG found that BellSouth was incorrectly counting auto clarifications. In March of 2001, BellSouth responded to Georgia Exception 21 in which BellSouth stated that a change was being made in the flow through script that had been causing the auto clarification count to be incorrect. BellSouth implemented this change effective with the April run of March data and going forward. There was no requirement at the time to rerun the October flow through report. In this observation, KPMG has again tested the October 2000 flow through report with the same results. BellSouth has now rerun the October report with the change implemented in Georgia exception 21, and find that the count of auto clarifications calculated by KPMG and the new count extracted by BellSouth match exactly (41,568)

Observation 68 needs to be amended for the following, which caused confusion in determining how to respond:

In the Observation section of the Observation Report, KPMG states that the November 2000 report could not be replicated. Although the report was issued in November, the report that KPMG was attempting to replicate was the October report and is dated 10/01/00 – 10/31/00.

Observation 68 refers to the use of the PMAP Raw Data User Manual by KPMG to replicate the flow through report. The flow through report is not a PMAP report, therefore there is no PMAP raw data, or reference in the Raw Data User Manual. Flow through is a Barney report and any replication of the report has to come from Barney data. In a clarification request sent to KPMG on May 15 asking if PMAP or Barney data was used to replicate the report, KPMG responded that Barney data was used. Therefore incorrect references to PMAP raw data are used in Observation 68.

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Once it was established that the October 2000 report was being used by KPMG, and they were using Barney data to replicate the report, BellSouth found that the table used in Observation 68 to report the number of auto clarifications found was reversed. The number of auto clarifications on the October 2000 flow through report (40824) was incorrectly shown as the KPMG calculated value.

### **BellSouth Amended Response:**

BellSouth has made additional coding changes to the Percent Flow Through Service Requests Report that will more accurately capture the CLEC's name. In instances where a CLEC's name is misspelled, or a variation of the name is used, it may not be captured. The coding change eliminates this possibility and will be implemented for the June 2001 data.